

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

OLLIE GREENE, Individually as the	§	
Surviving Parent of WYNDELL GREENE,	§	
SR., et al.,	§	CASE NO.: 3:11-CV-00207-N
	§	
Plaintiffs,	§	
vs.	§	JURY TRIAL DEMANDED
	§	
TOYOTA MOTOR CORPORATION	§	
et al.,	§	
	§	
Defendants.	§	

**NOTICE OF SERVICE OF DEFENDANT VOLVO GROUP NORTH AMERICA, LLC'S
RULE 26(a)(2) EXPERT DISCLOSURES**

TO THE HONORABLE COURT:

PLEASE TAKE NOTICE that Defendant Volvo Group North America, LLC f/k/a Volvo Trucks North America, pursuant to Federal Rule of Civil Procedure 26(a)(2)(A) and 26(a)(2)(B), has disclosed the identities and served upon all counsel of record the written reports, CVs, prior testimony lists and fee schedules of the following retained testifying experts:

Retained Testifying Experts

1. Kenneth T. Tandy
VehDyn, LLC
36 Palmer Woods Drive
The Woodlands, Texas 77381
Phone: (281) 770-7939
2. Stephen M. Werner, Ph.D., P.E.
Exponent
23445 N. 19th Avenue
Phoenix, Arizona 85027
Phone: (623) 582-6949

3. Timothy M. Cheek, P.E.
Delta [v] Forensic Engineering, Inc.
9401-D Southern Pine Boulevard
Charlotte, North Carolina 28273
Phone: (866) 433-3358
4. Helen Reynolds, Ph.D.
Ruhter & Reynolds
3625 North Hall Street, Suite 750
Dallas, Texas 75219
Phone: (214) 219-8100

VGNA has also designated the following individuals as non-retained third-party witnesses or VGNA employees who may offer expert opinion testimony:

Non-Retained Third-Party Witnesses

1. Trooper Dexter Barkley
Texas Department of Public Safety
111 Tejas Drive
Terrell, Texas 75160
Phone: (972) 551-6050
2. Trooper Christopher Countryman
Texas Department of Public Safety
111 Tejas Drive
Terrell, Texas 75160
Phone: (972) 551-6050
3. Trooper Clint Baughman
Texas Department of Public Safety
111 Tejas Drive
Terrell, Texas 75160
Phone: (972) 551-6050
4. Trooper Albert Cummins
Texas Department of Public Safety
111 Tejas Drive
Terrell, Texas 75160
Phone: (972) 551-6050

5. Dr. Lynn Salzberger
Asst. County Medical Examiner (Collin County, Texas.
700B Wilmeth Road
McKinney, Texas 75069
Phone: (972) 548-3775
6. Dr. Tracey Dyer
Southwestern Institution of Forensic Science at Dallas
2355 North Stemmons Fwy
Dallas, Texas 75207
Phone: (214) 920-5900
7. Dr. Chester Gwin
Southwestern Institution of Forensic Science at Dallas
2355 North Stemmons Fwy
Dallas, Texas 75207
Phone: (214) 920-5900

(All of these individuals have been deposed in this lawsuit.)

Non-Retained Experts – VGNA Employees

1. Charles Bird
c/o Volvo Group North America, LLC
7821 National Service Road
Greensboro, North Carolina 27409
(336) 393-2000
2. Andrew Adams
c/o Volvo Group North America, LLC
7821 National Service Road
Greensboro, North Carolina 27409
(336) 393-2000

(Both of these individuals have been deposed in this lawsuit.)

VGNA has also cross-designated those experts designated by VGNA's co-defendants in this suit – including their related reports and other materials produced. Such designation

includes, but is not limited to, experts identified by the following co-defendants (even if any, some, or all of these entities are dismissed from this suit prior to trial):

1. Toyota Motor Corporation;
2. Toyota Motor Engineering & Manufacturing North America, Inc.;
3. Toyota Motor Sales, USA., Inc.;
4. Strick Trailers, LLC;
5. John Fayard Moving & Warehouse, LLC; and
6. Dolphin Line, Inc.

In making these cross-designations, however, VGNA specifically reserves the right to *(i)* de-designate or withdraw such cross-designation(s); *(ii)* challenge and/or move to strike the opinions made or offered by such individuals; and *(iii)* challenge the qualifications of such individuals to offer such opinions.

Finally, VGNA reserves the right to elicit expert testimony from rebuttal and impeachment witnesses whose testimony cannot be reasonably anticipated at this time.

Respectfully submitted,



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**ATTORNEYS FOR DEFENDANT VOLVO
GROUP NORTH AMERICA, LLC f/k/a
VOLVO TRUCKS NORTH AMERICA**

CERTIFICATE OF SERVICE

This is to certify that on the 20th day of December, 2013, a true and correct copy of the above and foregoing was forwarded to all non-registered counsel of record in accordance with the Federal Rules of Civil Procedure to all registered counsel of record by electronic service through the court's ECF system in compliance with Federal Rule of Civil Procedure 5(b)(2)(E) and 5(b)(3).

A handwritten signature in cursive script that reads "Randy Howry". The signature is written in black ink and is positioned above a horizontal line.

Randy Howry